

Exhibit C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN BRADLEY,

Plaintiff,

v.

TIMOTHY J. CRUZ (Individually),
MICHAEL HORAN (Individually),
FRANK J. MIDDLETON (Individually),
AND OFFICE OF THE DISTRICT
ATTORNEY FOR PLYMOUTH
COUNTY,

Defendants.

Civil Action No. 1:13-cv-12927-IT

AFFIDAVIT OF MICHELLE MAWN

1. My name is Michelle Mawn. I am the Director of the Victim Assistance Program with the Plymouth County District Attorney's Office ("the Office"). I have worked in this position since 1992.
2. I am making this affidavit based on my personal knowledge.
3. I was Mary Glavin's Supervisor from September 1992 until September 2015, when Mary left her position at the Office.
4. Mary Glavin did not receive the promotion to Deputy Director of the Victim/Witness Program position because of confidential personnel reasons. The decision not to promote Mary Glavin had nothing to do with political contributions.
5. At no point during my employment at the Plymouth County District Attorney's Office, including the time surrounding D.A. Cruz's November 2010 election, have I felt pressure to contribute (monetarily or otherwise) to D.A. Cruz's campaigns.

Signed under the pains and penalties of perjury, this 14th day of June, 2016

A handwritten signature in cursive script that reads "Michelle Mawn". The signature is written in dark ink and is positioned above the printed name.

Michelle Mawn